

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DONNA FEHN,

Plaintiff,

: 07 CIV. 8321 (WCC)  
:

-against-

GROUP LONG TERM DISABILITY PLAN FOR  
EMPLOYEES OF JP MORGAN CHASE BANK, JP  
MORGAN CHASE BANK, as Plan Administrator,  
HARTFORD LIFE AND ACCIDENT INSURANCE  
COMPANY, as Administrator/Fiduciary of the Plan,  
KRISTA DUDECK, Individually, DANIEL BERTA,  
Individually, KARA MORETT, Individually, and  
DESMOND "Doe," Individually,

: **NOTICE OF MOTION FOR**  
: **RECONSIDERATION**  
:


Defendants.  
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**PLEASE TAKE NOTICE** that upon the annexed Affidavit of Stacey L. Blecher, duly sworn to on July 15, 2008, and accompanying exhibits (the "Blecher Aff."); the accompanying Memorandum of Law; and upon all prior pleadings and proceedings heretofore had herein, Defendant JPMorgan Chase Bank, N.A., erroneously named herein as "JPMorgan Chase Bank" ("JPMorgan Ghase"), will move this Court before the Honorable William C. Conner at the United States Courthouse, 300 Quarropas Street, White Plains, New York, 10601, pursuant to Federal Rule of Civil Procedure 59(e) and Local Civil Rule 6.3 for reconsideration of a portion of the Court's Opinion and Order dismissing JPMorgan Chase's Counterclaim dated June 30, 2008 (the "Order"), which was filed in the Clerk's office on June 30, 2008.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda shall be served on JPMorgan Chase within ten (10) business days after service of the moving papers. JPMorgan Chase's reply papers, if any, shall be served on Plaintiff within five (5) business day after service of Plaintiff's answering papers.

Dated: July 15, 2008

**JPMORGAN CHASE LEGAL &  
COMPLIANCE DEPARTMENT**

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